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Defendants
**HIDDEN EMPIRE HOLDINGS, LLC;
HYPER ENGINE, LLC; DEON
TAYLOR; AND THIRD-PARTY
DEFENDANT ROXANNE TAYLOR**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA



HIDDEN EMPIRE HOLDINGS, LLC;
a Delaware limited liability company;
HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual,

Plaintiffs,

v.

DARRICK ANGELONE, an individual;
AONE CREATIVE, LLC formerly
known as AONE ENTERTAINMENT
LLC, a Florida limited liability
company; ON CHAIN
INNOVATIONS, LLC, a Florida
limited liability company,

Defendants.

CASE NO. 2:22-cv-06515-MWF-AGR

Assigned for all purposes to the
Honorable Judge Michael W. Fitzgerald

**PLAINTIFFS' RESPONSE TO
DEFENDANT'S OPPOSITION TO
REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF MOTION FOR
ORDER TO SHOW CAUSE RE
IMPOSITION OF SANCTIONS**

*[Filed concurrently with Plaintiffs' Reply
To Defendants' Opposition To Motion
For Order To Show Cause; Plaintiffs'
Supplemental Compendium of Evidence;
Objections and Request to Strike
Defendants' Expert Witness Disclosures
and Corresponding Reports of Rick
Watts; Response to Plaintiffs' Objections
to Request for Judicial Notice; and Notice
of Manual Filing or Lodging]*

Date: March 18, 2024
Time: 10:00 a.m.
Courtroom: 5A

Case No.: 2:22-cv-06515-MWF-AGR

PLAINTIFFS' RESPONSE TO DEFENDANT'S OPPOSITION TO REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF MOTION FOR ORDER TO SHOW CAUSE RE IMPOSITION OF SANCTIONS

1 DARRICK ANGELONE, an individual;
2 AONE CREATIVE LLC, formerly
3 known as AONE ENTERTAINMENT
4 LLC, a Florida limited liability
5 company; ON CHAIN INNOVATIONS
6 LLC, a Florida limited liability
7 company

8 Counterclaimants,

9 HIDDEN EMPIRE HOLDINGS, LLC;
10 a Delaware limited liability company;
11 HYPER ENGINE, LLC; a California
12 limited liability company; DEON
13 TAYLOR, an individual,

14 Counterclaim
15 Defendants,

16 DARRICK ANGELONE, an individual;
17 AONE CREATIVE LLC, formerly
18 known as AONE ENTERTAINMENT
19 LLC, a Florida limited liability
20 company; ON CHAIN INNOVATIONS
21 LLC, a Florida limited liability
22 company,

23 Third-Party Plaintiffs,

24 v.

25 ROXANNE TAYLOR, an individual,

26 Third-Party Defendant



TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiffs Hidden Empire Holdings, LLC, Hyper Engine, LLC and Deon Taylor (collectively “Plaintiffs”) hereby respond to Defendants Darrick Angelone, AOne Creative LLC, and On Chain Innovations, LLC’s (collectively “Defendants”) opposition to Plaintiffs’ Request for Judicial Notice in Support of their Motion for an Order to Show Cause as to why Sanctions should not be Imposed against Defendants for (1) Violating the Preliminary Injunction [Contempt] and (2) Spoliation of Evidence.

Plaintiffs cited extensive evidence in the Declarations of Alex Izen (Dkt. 111-2) and Erin Burke (Dkt. 111-3) detailing Darrick Angelone’s (“Angelone”) long-standing close association with the name “Jacky Jasper” and efforts to hide behind that name to violate the Injunction in this case, respectively. Despite this mountain of evidence, Defendants remarkably claim that the documents attached to Plaintiffs’ Request for Judicial Notice pertaining to litigation where a court found “Jacky Jasper” to be not a real person but an alias used by Angelone to commit libel and defame people on the internet are not relevant to the instant motion.

Defendants could not be more wrong. This evidence is highly probative of the issue of whether Angelone was again pretending to be “Jacky Jasper” in his dealings with Plaintiffs to shield himself from repercussions for intentionally violating the Injunction or, alternatively, working in concert with someone else using the name “Jacky Jasper” to achieve the same end result. The records attached to Plaintiffs’

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1 Request for Judicial Notice are directly related to these issues and are therefore
2 judicially noticeable by the Court. *United States ex rel. Robinson Rancheria*
3 *Citizens Council v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir. 1992) (citation
4 omitted).

5 Respectfully submitted,

6 Dated: March 4, 2024

Lawrence A. Hinkle

7
8 By:

9 Lawrence Hinkle, Esq.
10 Stephanie Jones Nojima, Esq.
11 Joshua R. Engel, Esq.
12 Attorneys for Plaintiffs,
13 **HIDDEN EMPIRE HOLDINGS, LLC;**
14 **HYPER ENGINE, LLC; DEON TAYLOR;**
15 **AND THIRD-PARTY DEFENDANT**
16 **ROXANNE TAYLOR**



PROOF OF SERVICE

(CODE CIV. PROC. § 1013A(3))

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 1055 West 7th Street, Los Angeles, CA 90017. My electronic service address is esanders@sandersroberts.com.

On March 4, 2024, I served the following document(s) described as **PLAINTIFFS' RESPONSE TO DEFENDANT'S OPPOSITION TO REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR ORDER TO SHOW CAUSE RE IMPOSITION OF SANCTIONS** on the interested parties in this action as follows:

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*Co-Counsel for Defendants, Darrick
Angelone, AOne Creative, LLC, On Chain
Innovations, LLC*

☒ **VIA ELECTRONIC MAIL** I caused the documents to be transmitted electronically through the approved vendor for e-filing by electronic service on the party(s) identified on the attached service list using the e-mail address(es) shown I did not receive, within a reasonable time after transmission, any email or other indication that the transmission(s) were unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 4, 2024, at Los Angeles, California.

Rhonda Bruton

(Type or print name)

Rhonda Bruton

